

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

ANN K. FOUST,	:	Civil Action No. 1:11cv0689
	:	
Plaintiff,	:	Judge William O. Bertelsman
	:	
vs.	:	
	:	
BUTLER COUNTY, et al.,	:	
	:	
Defendant.	:	

**STIPULATED PROTECTIVE ORDER**

Defendant, Butler County Auditor's Office, as part of its discovery in the above-captioned matter, served a subpoena on the Ohio Department of Job & Family Services (ODJFS) for the production of certain documents concerning the unemployment file of Ann K. Foust. ODJFS agrees to produce the requested information, if it exists, under seal per the terms of this Order.

Accordingly, it is so ORDERED.

That the produced documents be marked "CONFIDENTIAL – SUBJECT TO PROTECTIVE ORDER."

That such information and documents be considered confidential, and shall be disclosed under seal, subject to inspection only by:

1. The parties to this litigation and their agents;
2. Counsel for the parties to this litigation, including their support staffs;
3. Court reporters and recorders engaged in this action;
4. The service company that issued the subpoena for Butler County Auditor's Office;
5. Consultants, investigators, or experts (referred to collectively as "experts") employed by the parties or counsel for the parties to assist in the preparation and trial of this action or proceeding; and
6. Other persons only by written consent of the producing party or upon order of the Court and on such conditions as may be agreed or ordered.

Counsel for the parties shall take reasonable and appropriate measures to prevent unauthorized disclosure of documents pursuant to the terms of this Order.

If a party intends to present at trial any of the documents pursuant to the terms of this Order, then such party shall provide advance notice to the other parties at least five (5) days before commencement of trial by identifying the documents or information at issue as specifically as possible (i.e., by Bates number, page range, deposition transcript lines, etc.) without divulging the actual documents or information. The Court may, thereafter, make such orders as necessary to govern the use of such documents or information at trial.

This Order shall be subject to modification by the Court on its own motion or on motion of a party or any other person with standing concerning the subject matter. Motions to modify this Order shall be served and filed under Local Rule 7.1.

This Order is entered based on the representations and agreements between ODJFS and the Defendant for the purpose of facilitating discovery.

So Ordered.

*Stephanie K. Bowman, United States Magistrate Judge*

Dated: March 13, 2012

WE SO STIPULATE and agree to abide by the terms of this Order.

/s/ Patria V. Hoskins  
Assistant Attorney General  
Health & Human Services Section  
30 E. Broad Street, 26<sup>th</sup> floor  
Columbus, Ohio 43215-3400  
614.466.8600  
866.490.2751 Fax  
[patria.hoskins@ohioattorneygeneral.gov](mailto:patria.hoskins@ohioattorneygeneral.gov)  
Attorney for ODJFS

s/ Linda L. Woeber (per e-mail auth.)  
Linda L. Woeber (0039112)  
Brian M. Spiess (0085049)  
Attorneys for Defendants  
MONTGOMERY, RENNIE & JONSON  
36 East Seventh Street, Suite 2100  
Cincinnati, Ohio 45202  
PH: 513/241-4722 / FX: 513/768-9239  
[lwoeber@mrjlaw.com](mailto:lwoeber@mrjlaw.com)  
[bspiess@mrjlaw.com](mailto:bspiess@mrjlaw.com)

/s/ Jon B. Allison (per e-mail auth.)  
Jon B. Allison (0073955)  
George M. Reul, Jr. (0069992)  
Attorneys for Plaintiff  
FREKING & BETZ, LLC  
525 Vine Street, Sixth Floor  
Cincinnati, Ohio 45202  
PH: 513/721-1975 / FX: 513/651-2570  
[jallison@frekingandbetz.com](mailto:jallison@frekingandbetz.com)  
[greul@frekingandbetz.com](mailto:greul@frekingandbetz.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on March 9, 2012, a copy of the **STIPULATED PROTECTIVE ORDER** was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Patria V. Hoskins  
PATRIA V. HOSKINS (0034661)  
Assistant Attorney General